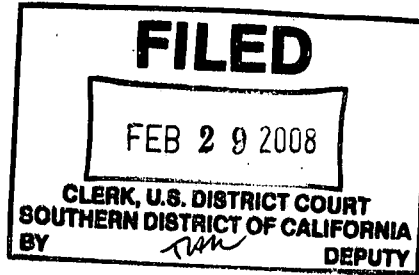


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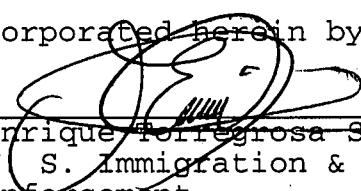
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA '08 MJ 8189

UNITED STATES OF AMERICA ) Magistrate Case No.:  
 )  
Plaintiff, ) COMPLAINT FOR VIOLATION OF  
 )  
v. ) 21 U.S.C. § 952 and 960  
 ) Importation of a Controlled  
Cecilia REYES-Chavez, ) Substance (Felony)  
 )  
Defendant. )

The undersigned complainant being duly sworn states:

That on or about February 29, 2008 within the Southern District of California, defendant Cecilia REYES-Chavez, did knowingly and intentionally import approximately 32.74 kilograms (72.02 pounds) of marijuana, a Schedule I Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Section 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

  
Enrique Torresgosa Special Agent  
U. S. Immigration & Customs  
Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 29<sup>th</sup> DAY OF FEBRUARY 2008.

  
PETER C. LEWIS  
UNITED STATES MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA

v.

2 Cecilia REYES-Chavez

3 STATEMENT OF FACTS

4 This complaint is based on the reports, documents, and notes  
5 furnished to U.S. Immigration and Customs Enforcement Special Agent  
6 Enrique Torregrosa.

7 On February 29, 2008, at approximately 0032 hours, Cecilia  
8 REYES-Chavez entered the United States from the Republic of Mexico  
9 via the Calexico, California, West Port of Entry. REYES made entry  
10 into the United States driving a 1990 Honda Accord bearing  
11 California U. S. plate number 2SJG261. REYES was the driver,  
12 registered owner and sole occupant of the vehicle.

13 At primary inspection, REYES gave an oral negative Customs  
14 declaration to Customs and Border Protection Officer (CBPO) A.  
15 Moreno. REYES stated she was going back home to San Bernardino.  
16 CBPO Moreno noticed that REYES was nervous CBPO Moreno stated  
17 REYES was very friendly. CBPO also noticed that the vehicle had an  
18 empty glove compartment. CBPO Moreno referred REYES and her  
19 vehicle to vehicle secondary lot for further inspection.

20 Upon arrival to the vehicle secondary lot, CBPO German  
21 contacted REYES and obtained a negative Customs declaration, and  
22 asked REYES about the vehicle she was driving, and where she was  
23 going. REYES stated that she just bought the vehicle and was going  
24 to San Bernardino. CBPO German noticed REYES appeared to be  
25 nervous as she was shifting her body and could not stop playing  
26 with her hair. CBPO German stated REYES later changed her story by  
27 saying that her cousin gave her the vehicle and her cousin was in  
28 prison. CBPO German conducted an inspection of the vehicle and

1 noticed a compartment located in the trunk of the vehicle. CBPO  
2 German requested for CBP Canine Officer Parrish to screen the  
3 vehicle utilizing his assigned Human/Narcotic Detector Dog (HNDD).  
4 CBP Canine Officer Parrish screened the vehicle and his HNDD  
5 alerted to the trunk area of the vehicle. CBPO German escorted  
6 REYES to the vehicle secondary office where a pat-down on REYES was  
7 conducted with negative results.

8 A subsequent search of the trunk area of the vehicle by CBPO  
9 German revealed thirty packages concealed within a specially built  
10 compartment. The approximate weight of the packages was 32.74  
11 kilograms (72.02 pounds). CBPO German probed one package, which  
12 produced a green leafy substance, which field-tested positive for  
13 marijuana.